

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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WINTER STORM SHIPPING, LTD., :

Plaintiff, : 01 Civ 5650 (SAS)

- against - :

TPI OIL (1997) CO. and IRPC PUBLIC :
COMPANY LIMITED f/k/a, TPI a/k/a :
THAI PETROCHEMICAL, :
INDUSTRY PUBLIC COMPANY LIMITED, or :
THAI PETROCHEMICAL INDUSTRY PCL, :
LTD., :

Defendants.

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**NOTICE OF MOTION FOR LEAVE
TO FILE SECOND AMENDED COMPLAINT**

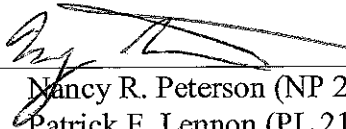
PLEASE TAKE NOTICE that Plaintiff, WINTER STORM SHIPPING, LTD. (hereinafter "Plaintiff"), by its attorneys Tisdale & Lennon, LLC, upon the annexed Affidavit of Nancy R. Peterson dated April 13, 2007, the exhibits annexed thereto, the accompanying Memorandum of Law, and the pleadings and proceedings previously had herein, will move this Court, before the Honorable Shira A. Scheindlin, United States District Court Judge, at the United States Courthouse for the Southern District of New York, 500 Pearl Street, Courtroom 15C, New York, New York, on May 4, 2007 at _____m. for an Order granting Plaintiff leave to amend its complaint, together with such other, further and different relief as the Court may deem just and proper.

PLEASE TAKE FURTHER NOTICE that opposing papers, if any must be served so as to be received by Plaintiff's counsel no later than the close of business on April 20,

2007 and that reply papers, if any, must be served so as to be received by Defendant or Defendant's counsel by May 2, 2007.

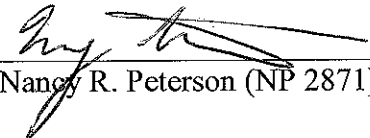
Dated: Southport, CT
April 13, 2007

The Plaintiff,
WINTER STORM SHIPPING,
LTD.

By: 
Nancy R. Peterson (NP 2871)
Patrick F. Lennon (PL 2162)
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AFFIRMATION OF SERVICE

I hereby certify that on April 13, 2007, a copy of the foregoing Memorandum of Law was filed electronically and served by mail on anyone unable to accept electronic filing. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system or by mail to anyone unable to accept electronic filing. Parties may access this filing through the Court's CM/ECF system.

By: 
Nancy R. Peterson (NP 2871)